1/10/80 1081 King

Department of Energy
Oak Ridge Operations
P.O. Box E
Oak Ridge, Tennessee 37830

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Joe King, Engineering Division, DOE

COMMENTS ON DRAFT FEASIBILITY STUDY FOR REDUCTION OF AIRBORNE METALS (NICKEL)

1. While we support the hope that the final OSHA standard for airborne nickel will not be at the NIOSH recommended level of 0.015 mg/m^3 and that the 0.1 mg/m^3 level would be a more reasonable level to work toward, we should still have this study address (to some extent) the feasibility of attaining the 0.015 mg/m^3 of nickel and problems and costs involved, if it is indeed possible. This would provide some additional basis for making the decision on what control would be provided.

2. There appears to be discrepancies in the amount of control and approaches to control similar operations at the different sites (i.e., ORGDP proposes ventilated grinding stations for some areas while GAT says these operations do not require control due to size of particles and degree of hazards). Some additional consideration should be given to the approach taken at different sites to assure the differences are justified.

3. While the study states that a target level of .1 mg/m^3 of nickel is chosen as for the study, GAT appears to be working toward 0.015 mg/m^3 (page 7).

4. The need for HEPA filters as a backup to filter collectors system is questioned.

Gary L. Love
Health Protection Branch
Safety and Environmental Control Division

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Enclosure:
Subject Study w/att.

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